

STANDARD INSPECTION REPORT OF A GAS TRANSMISSION PIPELINE RECORD AUDIT

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If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

Operator: NRG Wholesale Generation LP	Operator ID#: 31999
Inspection Date(s): 3/22/2016, 3/23/2016	Man Days: 2
Inspection Unit: NRG Wholesale Generation LP	
Location of Audit: Neoga	
Exit Meeting Contact: Gil Smith	
Inspection Type: Standard Inspection - Record Audit	
Pipeline Safety Representative(s): Donald Hankins	
Company Representative to Receive Report: Gil Smith	
Company Representative's Email Address: gil.smith@nrgenergy.com	

Headquarters Address Information:	344A RR 1 Centerline Road Neoga, IL 62447 Emergency Phone#: (866) 497-2284 Fax#:	
Official or Mayor's Name:	Donald Claybaugh Phone#: (815) 207-5870 Email: donald.claybaugh@nrg.com	
Inspection Contact(s)	Title	Phone No.
Gil Smith	Plant Manager	

Gas System Operations	Status
Gas Transporter	Trunkline
Miles of Main	2 Miles
Confirm Operator's Potential Impact Radius Calculations	346.6
Annual Report (Form 7100.2.1) reviewed for the year:	Satisfactory
Regulatory Reporting Records	Status
<u>Category Comment:</u>	
NRG Wholesale LP had no incidents in the years of 2014, 2015, or 2016	
[191.5]	Were Telephonic Notices of Incidents reported to the NRC (800-424-8802)?
	Not Applicable
[191.15(a)]	Was a DOT Incident Report Form F7100.2 submitted
	Not Applicable

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	within 30 days after detection of an incident?	
[191.15(b)]	Were there any supplemental incident reports when deemed necessary?	Not Applicable
[191.23(a)]	Did the operator report Safety Related Conditions?	Not Applicable
[191.25]	Did the Operator file a Safety Related Condition Report within 5 working days of determination, but not later than 10 working days after discovery?	Not Applicable
[192.16(c)]	Customer Notification: Has the operator notified each customer after the customer first receives gas at a particular location?	Not Applicable
<u>General Comment:</u> NRG Wholesale LP had no customers off their pipeline.		
TEST REQUIREMENTS		Status
[192.517(a)][192.505,192.507,192.509,192.511(c)]	Are pressure test records being maintained for piping operating above 100 psig?	Not Applicable
<u>General Comment:</u> No pipe was installed for a pressure test to be conducted in the years of 2014, 2015, or 2016.		
[192.517(b)][192.511,192.509,192.513]	Are pressure test records being maintained for at least 5 years on piping operating below 100 psig?	Not Applicable
<u>General Comment:</u> NRG Wholesale LP has no piping operating below 100 psig.		
UPRATING		Status
<u>Category Comment:</u> No uprating has been conducted in the years of 2014, 2015, or 2016		
[192.555][192.555]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of 30% or more SMYS?	Not Applicable
[192.557][192.557]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of less than 30% SMYS?	Not Applicable
OPERATIONS		Status
[192.603(b)][192.605(a)]	Has the operator conducted a review of the Operations and Maintenance Manual once per yr/15 months?	Satisfactory
<u>General Comment:</u> The operation and maintenance manual was reviewed in 2013, 2014, and 2015		
Has the operator conducted a review of the Operator Qualification Plan once per yr/15 months?		Yes

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<u>General Comment:</u> <i>The operator qualification plan was reviewed once a year not to exceed 15 months, records were inspected for the years of 2013, 2014, and 2015.</i>		
[192.603(b)][192.605(b)(3)]	Are construction records, maps, and operating history available to operating personnel?	Satisfactory
<u>General Comment:</u> <i>Construction records and maps are available to operating personnel.</i>		
[192.603(b)][192.605(b)(8)]	Has the operator periodically reviewed personnel's work to determine the effectiveness of normal O&M procedures when deficiencies are found?	Satisfactory
<u>General Comment:</u> <i>Personnel work will be reviewed if deficiencies are found.</i>		
[192.603(b)][192.605(c)(1)(i)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of unintended closure of valves or shutdowns?	Not Applicable
<u>General Comment:</u> <i>No unintended closure of valves or shutdowns in the years of 2013, 2014, or 2015.</i>		
[192.603(b)][192.605(c)(1)(ii)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of increase or decrease in pressure or flow rate outside normal operating limits?	Not Applicable
<u>General Comment:</u> <i>NRG Wholesale had no increase or decrease in pressure or flow rate outside normal operating limits in the years of 2013, 2014, or 2015.</i>		
[192.603(b)][192.605(c)(1)(iii)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of loss of communications?	Not Applicable
<u>General Comment:</u> <i>NRG Wholesale LP had no loss of communication in the years of 2013, 2014, or 2015.</i>		
[192.603(b)][192.605(c)(1)(iv)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of operation of any safety device?	Not Applicable
<u>General Comment:</u> <i>No correcting of operations of any safety device in 2013, 2014, or 2015.</i>		
[192.603(b)][192.605(c)(1)(v)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of any other foreseeable malfunction of a component, deviation from normal operation, or personnel error which may result in a hazard to persons or property?	Not Applicable

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<u>General Comment:</u>		
<i>The operator had no correcting of any other foreseeable malfunction</i>		
[192.603(b)][192.605(c)(2)]	Does the operator maintain documentation of checking variations from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation?	Not Applicable
<u>General Comment:</u>		
<i>The operator had no variations from normal operations in the years of 2013, 2014, or 2015.</i>		
[192.603(b)][192.605(c)(3)]	Does the operator maintain documentation of notifying responsible operator personnel when notice of an abnormal operation is received?	Not Applicable
<u>General Comment:</u>		
<i>The operator had no abnormal operations in 2013, 2014, or 2015.</i>		
[192.603(b)][192.605(c)(4)]	Does the operator maintain documentation for periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found?	Not Applicable
<u>General Comment:</u>		
<i>The operator had no abnormal operations in 2013, 2014, or 2015.</i>		
[192.603(b)][192.619,192.621,192.623]	Is the operator maintaining documentation verifying their Maximum Allowable Operating Pressure(s)? (MAOP)	Satisfactory
<u>General Comment:</u>		
<i>The pipeline has an MAOP of 1000# and operates at 900 #.</i>		
CONTINUING SURVEILLANCE RECORDS		Status
[192.709(c)][192.613(a)]	Has the operator reviewed continuing surveillance records for class location changes, failures, leak history, corrosion, changes in cathodic protection, and other unusual operating and maintenance conditions?	Satisfactory
<u>General Comment:</u>		
<i>Documentation shows that continuing surveillance records for class location changes have been reviewed.</i>		
CLASS LOCATION CHANGE		Status
[192.709(c)][192.609]	Does the operator maintain documentation when the class location changes for a segment of pipe operating at a hoop stress that is more than 40% SMYS?	Satisfactory
<u>General Comment:</u>		
<i>The operator has documentation of class location changes for a hoop stress of more than 40% SMYS.</i>		

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DAMAGE PREVENTION RECORDS		Status
[192.709(c)][191.17(a)]	Did the operator track the number of damages per 1000 locate requests for the previous years?	Satisfactory
<u>General Comment:</u> <i>No damages in the years of 2013, 2014 or 2015.</i>		
Has the number of damages increased or decreased from prior year?		same
[192.709(c)][192.617]	Does the operator track records of accidents due to excavation damage to ensure causes of failures are addressed to minimize the recurrence?	Not Applicable
<u>General Comment:</u> <i>No damages in the years of 2013, 2014 or 2015.</i>		
[192.709(c)][192.614(c)(3)]	Does the operator provide documentation pertaining to notification of excavation, marking, positive response, and the availability and use of the one call system?	Satisfactory
<u>General Comment:</u> <i>The operator has documentation of Julie notification and the work that was performed.</i>		
Does the operator have a Quality Assurance Program in place for monitoring the locating and marking of facilities?		Yes
<u>General Comment:</u> <i>Locating and marking is done in house.</i>		
Do pipeline operators include performance measures in facility locating contracts?		Not Checked
<u>General Comment:</u> <i>Locating is done in house.</i>		
[IL ADM. CO.265.100(b)(1)]	Was third party damage to mains involving a release of gas reported to ICC JULIE Enforcement? http://www.icc.illinois.gov/julie/	Not Applicable
<u>General Comment:</u> <i>No damages in the years of 2013, 2014 or 2015.</i>		
Has the Operator adopted applicable section of the Common Ground Alliance Best Practices?		Not Applicable
<u>General Comment:</u> <i>Common Ground Best Practices have been adopted by the operator.</i>		
If no, were Common Ground Alliance Best Practices discussed with Operator?		Not Applicable
<u>General Comment:</u> <i>Common Ground Best Practices was discussed with the operator.</i>		

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EMERGENCY PLANS		Status
[192.603(b)][192.615(b)(1)]	Are supervisors, responsible for emergency action, furnished copies of the latest edition of the Emergency Plan?	Satisfactory
<u>General Comment:</u> <i>Supervisors are furnished with the latest emergency plan.</i>		
[192.603(b)][192.615(b)(2)]	Has the operator maintained documentation that the appropriate operating personnel have received training to assure they are knowledgeable of emergency procedures and that the training was effective?	Satisfactory
<u>General Comment:</u> <i>The operator is maintaining documentation of proper training.</i>		
[192.603(b)][192.615(b)(3)]	Has the operator maintained documentation of employee activity reviews to determine whether the procedures were effectively followed in each emergency?	Not Applicable
<u>General Comment:</u> <i>The operator has not had any emergencies in the years of 2013, 2014, or 2015.</i>		
[192.603(b)][192.615(c)]	Has the operator maintained documentation that the operator established and maintained liaison with appropriate fire, police and other public officials?	Satisfactory
<u>General Comment:</u> <i>The operator has documentation of liaison meetings for the years of 2013, 2014, and 2015.</i>		
[192.603(b)][192.615(a)(3)]	Did the review of emergency response time intervals regarding odor/leak complaint documentation indicate adequate emergency response intervals were achieved?	Not Applicable
<u>General Comment:</u> <i>The operator has not had any emergency calls in the years of 2013, 2014, or 2015.</i>		
[192.603(b)][192.615(a)(11)]	Has the operator maintained documentation of actions that were required to be taken by a controller during an emergency?	Not Applicable
<u>General Comment:</u> <i>The operator has not had any emergency calls in the years of 2013, 2014, or 2015.</i>		
ODORIZATION OF GAS		Status
<u>Category Comment:</u> <i>The operator does not odorize their gas.</i>		
[192.709(c)][192.625(f)]		Not Applicable

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	Where required, has the operator maintained documentation of odorant concentration level testing?	
[192.709(c)][192.625(e)]	Where required, has the operator maintained documentation of odorizer tank levels?	Not Applicable
PATROLLING & LEAKAGE SURVEY		Status
[192.709(c)][192.705]	Does the operator maintain documentation of a patrol program as required?	Satisfactory
<u>General Comment:</u> <i>The operator maintain documentation of their patrolling for the years of 2013, 2014, and 2015.</i>		
[192.709(c)][192.706]	Does the operator maintain documentation of leakage survey(s) performed on a transmission pipeline?	Satisfactory
<u>General Comment:</u> <i>The operator maintains documentation of leakage surveys for the years of 2013, 2014, and 2015.</i>		
ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES		Status
<u>Category Comment:</u> <i>NRG have no abandonment of pipe in the years of 2013, 2014, or 2015.</i>		
[192.603(b)][192.727(b)]	Did the operator maintain documentation demonstrating that each pipeline abandoned in place was disconnected from all sources and supplies of gas, and purged of gas?	Not Applicable
[192.603(b)][192.727(c)]	Did the operator maintain documentation demonstrating that each inactive pipeline that is not being maintained under this part was disconnected from all sources and supplies of gas; purged of gas?	Not Applicable
[192.603(b)][192.727(e)]	Did the operator maintain documentation when air was used for purging that a combustible mixture was not present after purging?	Not Applicable
[192.727(g)][192.727(g)]	Did the operator maintain documentation for each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway?	Not Applicable
COMPRESSOR STATION		Status
<u>Category Comment:</u> <i>The operator has no compressor stations in their gas system.</i>		
[192.709(c)][192.731(a)]	Has the operator maintained documentation of the compressor station relief devices at a minimum of 1 per year/15 months?	Not Applicable
[192.709(c)][192.731(c)]	Has the operator maintained documentation compressor station emergency shutdown at a minimum of 1 per	Not Applicable

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	year/15 months?	
[192.709(c)][192.736(c)]	Has the operator maintained documentation of the compressor stations – detection and alarms?	Not Applicable
PRESSURE LIMITING AND REGULATION		Status
<u>Category Comment:</u> <i>The operator does not have pressure limiting station on their gas system. The operator is running the same line pressure as Trunkline.</i>		
[192.709(c)][192.739(a)]	Is the operator inspecting and testing the pressure limiting and regulating stations at a minimum of 1 per year/15 months?	Not Applicable
[192.709(c)][192.743(a)]	Is the operator inspecting pressure limiting and regulating stations for adequate capacity at a minimum of 1 per year/15 months?	Not Applicable
[192.709(c)][192.743(b)]	If the operator used calculations to determine sufficient capacity, were the calculation reviews documented at a minimum of 1 per year/15 months?	Not Applicable
[192.709(c)][192.743(a),192.743(b),192.195(b)(2)]	Is overpressure protection provided by the supplier pipeline downstream of the take point?	Not Applicable
[192.709(c)][192.743(a)]	If Yes, does the operator have documentation to verify that these devices have adequate capacity?	Not Applicable
VALVE MAINTENANCE		Status
[192.709(c)][192.745(a),192.745(b)]	Did the operator inspect and partially operate transmission valves that might be required during any emergency at a minimum of 1 per year/15 months?	Satisfactory
<u>General Comment:</u> <i>The operator maintains documentation of transmission valves being inspected for the 2013, 2014, and 2015.</i>		
[192.709(c)][192.749]	Did the operator inspect and maintain vaults > 200 cubic feet at a minimum of 1 per year/15 months?	Not Applicable
<u>General Comment:</u> <i>The Operator has no vaults in their gas system.</i>		
[192.709(c)][192.179]	Are transmission line valves being installed as required of 192.179?	Not Applicable
<u>General Comment:</u> <i>No new valves have been installed in the years of 2013, 2014, or 2015.</i>		
[192.709(b)][192.745(b)]	Did the operator take prompt remedial action to correct any valve found inoperable, unless an alternative valve was designated?	Not Applicable
<u>General Comment:</u>		

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All valves are working properly in the years of 2013, 2014, or 2015.

Investigation Of Failures		Status
[192.709(c)][192.617]	Did the operator experience accidents or failures requiring analysis?	Not Applicable

General Comment:

The operator had no accidents or failures requiring analysis in the years of 2013, 2014, or 2015.

WELDING OF STEEL PIPE		Status
[192.603(b)][192.225(b)]	Does the operator have documentation for their qualified welding procedure?	Satisfactory

General Comment:

The operator does have a welding procedure in their O&M plan.

[192.603(b)][192.227,192.229]	Does the operator have documentation of welder qualification documentation as required?	Not Applicable
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General Comment:

The operator has not had any welding done in the years of 2013, 2014, or 2015.

[192.807]	Does the operator have documentation of welder OQ records?	Not Applicable
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General Comment:

If the operator needs a welder he will be OQ before he starts welding.

[192.709][192.243(b)(2)]	Does the operator have documentation of NDT personnel qualification as required?	Not Applicable
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General Comment:

No NDT testing was done in the years of 2013, 2014, or 2015.

[192.709][192.243(f)]	Does the operator have documentation of NDT testing performed?	Not Applicable
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General Comment:

No NDT testing was done in the years of 2013, 2014, or 2015.

CORROSION CONTROL RECORDS		Status
[192.491(a)][192.491(a)]	Has the operator maintained maps or records of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system	Satisfactory

General Comment:

Documentation shows that maps have anodes installed on the transmission line.

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[192.491][192.459]	Has the operator maintained documentation of examination when buried pipe was exposed?	Not Applicable
<u>General Comment:</u> <i>No exposed pipe on the gas system.</i>		
[192.491][192.465(a)]	Has the operator maintained documentation of annual pipe-to-soil monitoring performed at a minimum of 1 per yr/15 months and/or isolated services or short sections of main less than 100 feet at a minimum of 10% annually?	Satisfactory
<u>General Comment:</u> <i>Annual pipe-to-soil monitoring is done yearly, and there are no isolated sections of pipe.</i>		
[192.491][192.465(b)]	Has the operator maintained documentation of rectifier or other impressed current power sources inspections at a minimum of 6 per year/ 2 1/2 months?	Not Applicable
<u>General Comment:</u> <i>The operator does not have rectifiers on the gas system.</i>		
[192.491][192.465(c)]	Has the operator maintained documentation of each critical interference bond, reverse current switch, diode, etc. inspections at a minimum of 6 per year/ 2 1/2 months and/or non-critical interference bond inspections at a minimum of 1 per year/15 months?	Not Applicable
<u>General Comment:</u> <i>No critical or non-critical bonds on the gas line.</i>		
[192.491][192.465(d)]	Has the operator taken prompt remedial actions to correct any deficiencies indicated by the monitoring?	Not Applicable
<u>General Comment:</u> <i>No deficiencies were found on the gas system in the years of 2013, 2014, or 2015.</i>		
[192.491][192.465(e)]	Has the operator maintained documentation of unprotected pipeline surveys, inspections, or tests at a minimum of 3 years/39 months?	Not Applicable
<u>General Comment:</u> <i>The pipeline is all protected piping.</i>		
[192.491][192.467(a),192.467(c),192.467(d)]	Has the operator maintained documentation of inspections or tests for electrical isolation including casings?	Not Applicable
<u>General Comment:</u> <i>The operator has no casings on the gas pipeline.</i>		
[192.491][192.469]	Does the operator have a sufficient number of test stations or other contact points for electrical measurement to	Satisfactory

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	determine the adequacy of cathodic protection?	
<u>General Comment:</u> <i>The operator believes they have enough test stations on the system.</i>		
[192.491][192.471]	Has the operator maintained documentation of corrective actions taken when a test lead is no longer electrically conductive?	Satisfactory
<u>General Comment:</u> <i>All test leads are electrically conductive to the pipeline.</i>		
[192.491][192.473(b)]	Has the operator maintained documentation of inspections or tests to assure their cathodic protection system is not affecting adjacent underground metallic structures?	Not Applicable
<u>General Comment:</u> <i>There are no adjacent underground metallic structures.</i>		
[192.491][192.475(a)]	Has the operator maintained documentation of investigations or steps taken to minimize internal corrosion due to transportation of corrosive gas?	Not Applicable
<u>General Comment:</u> <i>The operator does not transport corrosive gas.</i>		
[192.491][192.475(b)]	Has the operator maintained documentation of internal surface inspections performed when pipe is removed for any reason?	Not Applicable
<u>General Comment:</u> <i>No pipe was removed in the years of 2013, 2014, or 2015.</i>		
[192.491]	Has the operator maintained documentation of written procedures supported by as-built drawings or other construction records?	Satisfactory
<u>General Comment:</u> <i>The operator is maintaining documentation of as built drawings.</i>		
[192.491][192.477]	Has the operator maintained documentation of internal corrosion coupon monitoring at a minimum of 2 per year/ 7 1/2 months?	Not Applicable
<u>General Comment:</u> <i>The operator does not do Internal corrosion coupon monitoring.</i>		
[192.491][192.479]	Has the operator maintained documentation of corrective action where atmospheric corrosion was discovered?	Satisfactory
<u>General Comment:</u>		

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<i>Atmospheric corrosion was not discovered in the years of 2013, 2014, or 2015.</i>		
[192.491][192.481]	Has the operator maintained documentation of atmospheric corrosion control monitoring at a minimum of 1 per 3 years/ 39 months?	Satisfactory
<u>General Comment:</u> <i>Atmospheric corrosion is being performed every three years.</i>		
[192.491][192.483(a),192.483(b),192.483(c)]	Has the operator maintained documentation demonstrating that pipe removed due to external corrosion has been repaired or replaced with pipe that was coated and cathodically protected?	Not Applicable
<u>General Comment:</u> <i>No pipe was removed in the years of 2013, 2014, or 2015.</i>		
TRAINING - 83 IL ADM. CODE 520		Status
[520.10(a) (1)]	Has the operator maintained documentation demonstrating that personnel have received adequate training?	Satisfactory
<u>General Comment:</u> <i>The operator keep record that show that personnel have adequate training.</i>		
[520.10(a) (2)]	Do training records include verbal instruction and/or on the job training for each job classification?	Satisfactory
<u>General Comment:</u> <i>The operator is keeping records of on job training for each employee.</i>		
[520.10(b)]	Has the municipal operator maintained documentation demonstrating that personnel have received adequate training?	Not Applicable
<u>General Comment:</u> <i>NRG Wholesale Generation LP is not a municipal operator.</i>		
[520.10(a)(5)]	Are procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	Satisfactory
<u>General Comment:</u> <i>The procedures are periodically updated, with the employee being notified of the changes.</i>		

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